Pre-Cast yard

In late July, received email from the City that KIWC, the City's Design/Build Contractor sent letters on July 14, 2010 to initiate the Hawaii State Environmental Process for a precast yard in vicinity the western end of the Honolulu rail alignment.

 The need for a precast yard was only briefly mentioned in the FEIS that was published in June 2010. The FEIS did not mention the size or potential locations for the precast yard other than staging areas may be located at proposed station or maintenance facility locations.

"The maintenance and storage facility, park-and ride facilities, and stations could be used for construction staging areas. Additional areas will be identified by the contractor. The contractor will be responsible for identifying necessary permits and approvals and, where applicable, the City will be the permit applicant. Additional construction and staging areas identified and requested by the contractor will be reviewed and approved by the City. Staging areas will be fenced to deter unauthorized entry. Upon completion of work, staging areas will be restored to a condition equal to or better than existing conditions as appropriate."

- Purpose of the precast yard would be to cast the concrete forms used to support the elevated transit system.
- In KIWC's letter to agencies, they were proposing to use a 34-acre parcel owned by the State of Hawaii Department of Hawaiian Home Lands and adjacent to Kalaeloa Airport – John Rogers Field. The area is designated as Federal and Military Preservation District and is considered urban.
- Letter was sent to USACE, Department of Interior, Fish and Wildlife Service, EPA, FAA and numerous other state and local agencies.

Contract states that:

The Design-Builder will be responsible for determining Precast Yard requirements for the Project. No areas will be provided by the City for the Precast Yard and it will be at the Design-Builder's discretion whether the Precast Yard shall be sited, subject to compliance with all other Contract provisions. In the event that this may be a new precasting facility, the Design-Builder will be responsible to make all necessary agreements with property owners for the Precast Yard and will be responsible for acquiring any permits necessary for that use.

In selecting the location for the Precast Yard, the Design-Builder's attention is drawn to haul routes which the Design-Builder shall submit for approval of the city. The Design-Builder shall submit to the City a site plan for the Precast Yard it proposes to use. The site plan shall include locations of perimeter fencing, gates, and access points and proposed means of handling and transporting precast elements from the Precast Yard to the Project site including haul routes.

The Design-Builder shall perform all Work in accordance with all Federal, State and local laws and regulations regarding air pollution and quality and shall control dust to ensure

that excessive dust is not transported beyond the limits of the Precast Yard and does not interfere with normal traffic operations or adjacent properties.

Clearance and Permits for the Precast Yard. The Design-Builder shall assess the proposed Precast Yard and obtain clearance, approval and permitted use for the proposed precast operations by all concerned regulatory agencies for archeological, wetland, and biological issues prior to construction.

- The Honolulu project has four project construction phases, each has a separate construction contract. The City indicated on a PMOC call in September that there could be up to four precast yards (one for each construction phase) or no precast yards with contractors instead opting to use an existing casting facility or have the structures built outside of Hawaii.
- Even though the facility would be temporary, could have permanent impacts depending on the location. Beyond NEPA, FTA needs to comply with Section 106 of the Historic Preservation Act and Section 7 of the Endangered Species Act.
- The City has concerns with any supplementation of the environmental document due to challenges in the Hawaii State environmental process that provides limited flexibility with additional information.

Options for handling the precast yard at this stage of the environmental and new starts process:

- Require the City to locate the precast yard at a location already evaluated in detail in the EIS process. This would be completed prior to the completion of the ROD. There is an alternate maintenance facility. However, this may only apply to the first construction phase.
- Evaluate a range of potential precast yard options for the first construction phase and deal with other potential casting facilities on an as needed basis. This would be completed prior to a ROD.
- Require the City to provide an evaluation of the initially proposed site near Rogers Air Field to be completed prior to the ROD.
- The City has requested that FTA hold off on evaluating the precast yard until after the ROD.

• Determine that the precast yard is strictly a local matter and out of FTA's control.